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UNITED STATES DISTRICT COURT

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SOUTHERN DISTRICT OF OHIO

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WESTERN DIVISION

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ERIC L. JEFFRIES,

:

6

Plaintiff,

:

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CENTRE LIFE INSURANCE

:

Case No. C-1-02-351

8

COMPANY, et al.,

:

(Judge Beckwith)

9

Defendants.

:

10

11

Deposition of MICHAEL E. LUGGEN, M.D.,

12

a witness herein, called by the Defendants for

13

direct examination, pursuant to the Federal Rules of

14

Civil Procedure, taken before me, Angie Portune, a

15

Registered Merit Reporter and Notary Public in and

16

for the State of Ohio, at the offices of Wood &

17

Lamping, Cincinnati, Ohio, on Friday, September 12,

18

2003, at 10:00 AM.

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19

10:47:30 1 A (Witness nodded head.)

2 Q Do you know whether he had been to Belgium  
3 or was planning to go to Belgium?

4 A I don't recall it. And I don't see that I  
10:47:49 5 indicated one way or the other. I did suggest to  
6 him, and the final sentence in that paragraph that  
7 participation in a clinical trial, a research study  
8 that might answer some questions, would be a  
9 reasonable thing to do if there was such a thing  
10:48:48 10 available.

11 Q Do you know whether he participated in any  
12 such studies?

13 A I don't know.

14 Q Did you ever make a definitive -- in all  
10:49:02 15 the times that you saw Mr. Jeffries, a definitive  
16 diagnosis based upon objective findings of any  
17 illness?

18 A No.

19 Q Were Mr. Jeffries' complaints to you  
10:49:15 20 throughout the course of your treatment with him  
21 consistent, or did they vary from time to time?

22 MR. ROBERTS: Objection.

23 A It seemed to me that they were consistent  
24 for the most part.

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1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF OHIO  
3 WESTERN DIVISION

4 - - - - -  
5 ERIC L. JEFFRIES, :  
6 vs. Plaintiff, : Case No. C-1-02-351  
7 CENTRE LIFE INSURANCE :  
8 COMPANY, et al., :  
9 Defendants. :  
10 - - - - -

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12 Deposition of DONALD NUNLIST-YOUNG, MD, a  
13 witness herein, called by the defendants for  
14 cross-examination, pursuant to the Federal Rules of  
15 Civil Procedure, taken before me, Connie Dupps, a  
16 Registered Professional Reporter and Notary Public  
17 in and for the State of Ohio, at the offices of  
18 Donald Nunlist-Young, MD, 2567 Erie Avenue,  
19 Cincinnati, Ohio, on Thursday, September 11, 2003,  
20 at 5:30 PM.

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23 Pages: 1 - 124

24

1 insurance company that this was a simple allergic  
2 reaction to a vaccination?

3 A. Yes.

4 MR. ROBERTS: Objection.

5 Q. Pardon?

6 A. Yes.

7 MR. ROBERTS: Objection.

8 Q. And you complied with that request?

9 A. I complied in that I stated it was a  
10 possibility, but not a certainty.

11 Q. Okay. Did he tell you when he talked to  
12 you on the 9th that he had been to see Dr. Dunn on  
13 the 8th with complaints of sore throat, pains in the  
14 abdomen, sore muscles, and joints?

15 A. No, I believe that's my nurse's writing  
16 and I did not speak with him.

17 Q. On the 9th?

18 A. On the 9th.

19 Q. Did you ever become aware he had seen Dr.  
20 Dunn on the 8th with complaints of significant sore  
21 throat, pains in the abdomen, sore muscles, and  
22 joints?

23 A. I became aware of that through a note from  
24 another arthritis specialist that he subsequently

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO

- - - - -  
ERIC L. JEFFRIES, :  
 :  
 Plaintiff, :  
 vs. : Case No. C-1-02-351  
 : (Judge S. S. Beckwith)  
 CENTRE LIFE INSURANCE :  
 COMPANY, et al., :  
 :  
 Defendants. :  
- - - - -

Deposition of CORWIN DUNN, M.D., a witness  
herein, called by the defendants for examination,  
pursuant to the Federal Rules of Civil Procedure,  
taken before me, Tracy L. Allen, a Registered  
Professional Reporter and Notary Public in and for  
the State of Ohio, at 2223 Auburn Avenue,  
Cincinnati, Ohio, on Friday, September 12, 2003, at  
2:15 PM.

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1 can't quite read that one. Something requesting?

2 A. Search requested. And I think it's GDL,  
3 which is I think a library, but I don't recall what  
4 GD stands for. That would have been the -- oh, I  
5 know what it is. Gamble Deaconess Library. That's  
6 the hospital library.

7 Q. Was he telling you he did the search or  
8 requesting you to do it?

9 A. Requesting that I do it.

10 Q. Did you comply with the request?

11 A. I believe I did.

12 Q. Were you able to allay his fears that he  
13 didn't have the objective symptoms consistent with  
14 hepatitis B arthritis?

15 A. I don't believe I allayed them.

16 Q. Did you try?

17 A. Yes.

18 Q. Did he seem pretty focused on that idea at  
19 the time?

20 A. Well, my recollection now is that this was  
21 a recurring theme that came up other times than just  
22 this telephone conversation. It was also discussed  
23 at several visits. And he brought in his own  
24 research materials, which indicates that this has

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